STATE OF MAINE
YORK, ss.

SUPREME JUDICIAL COURT
SITTING AS THE LAW COURT
LAW DOCKET NO. YOR-19-280

STATE OF MAINE,
Appellee

v.

EMMANUEL J SLOBODA,
Defendant-Appellant

On appeal from the York County Superior Court

BRIEF FOR THE STATE OF MAINE

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I. Procedural History

A. Indictment

On February 5, 2019, the Defendant, Emanuel Sloboda (hereinafter "Sloboda"), was indicted by a York County Grand Jury on one count of Aggravated Assault (Count 1), Class A, in violation of 17-A M.R.S. § 208(1)(C), one count of Domestic Violence Assault, Class C, in violation of 17-A M.R.S. §207-A(1)(A), and one count of Violation of Condition of Release, Class C, in violation of 15 M.R.S. §1092(1)(B). Appendix (hereinafter "App.") at 3. The Defendant was never formally arraigned prior to the handing down of a superseding indictment. App. at 3 – 4.

B. Superseding Indictment

On June 4, 2019, Sloboda was re-indicted by a York County Grand Jury on superseding indictment alleging one count of Aggravated Assault (Count 1), Class A, in violation of 17-A M.R.S. § 208(1)(C), one count of Domestic Violence Assault, Class C, in violation of 17-A M.R.S. § 207-A(1)(A), and three counts of Violation of Conditions of Release, all Class C, all in violation of 15 M.R.S. 1092(1)(B). App. at 4. Sloboda was formally

arraigned and entered not guilty pleas on the five-count indictment on June 17, 2019. App. at 4.

C. Waiver of Jury Trial Rights

On June 18, 2019, the State dismissed counts 1 and 2 of the superseding indictment. App. at 5. The Defendant, through counsel, advised that he would be waiving his jury trial rights and seeking a trial before a judge. App. at 5. On June 20, 2019, the Defendant waived his jury trial rights and the matter was set for a bench trial before Justice W. Douglas. App. at 5; Trial Transcript (hereinafter "Tr.") at 4.

D. Verdict.

After trial, the trial court found Sloboda guilty on Count 4, Violation of Conditions of Release, and not guilty on Count 5, Violation of Conditions of Release. App. at 5 – 6; Tr. at 109. On July 17, 2019, the trial court accepted a joint recommendation from both the State and the Defendant, that he be sentenced by the trial court to a term of 6 Months to the York County Jail with credit for any time detained and a $35 administrative fee. App. at 6. This appeal followed. App. at 7.

II. Statement of Facts

A. Burglary Allegation.

On September 4, 2018, Sloboda had been charged by complaint with 1 count of Burglary, Class B, in violation of 17-A M.R.S. § 401(1)(B)(4)[1], alleged to have occurred in Acton, Maine, on September 3, 2018.[2] App. at 32. The named victim of the Burglary was [redacted] App. at 32, Tr. at 69. [redacted] was the mother of Sloboda's ex-girlfriend, [redacted]. Tr. at 66 – 67. Sloboda and [redacted] had been boyfriend and girlfriend for eight to nine years prior to September of 2018, including having lived together over that time. Tr. at 67, 69.

On September 5, 2018, Sloboda was released from pretrial custody on conditions release.[3] App. at 32. Pursuant to his conditions of release issued by the York County Unified Criminal docket, Sloboda had specific conditions that included not to have contact with [redacted][4]. App at 33.

[1] Burglary, Class B, is a crime that is punishable by more than 1 year in jail. Tr. at 9; *See Also* 17-A M.R.S. 1252(2)(B).

[2] The Burglary case was docketed in the York County Unified Docket as YRK-CD-CR-18-826. App. at 32.

[3] The Bail Conditions in YRKCD-CR-18-826 are signed by Sloboda. App. at 30.

[4] Sloboda's conditions of release were: "Not to use or possess alcohol/illegal drugs/ dangerous weapons / firearms, submit to random searches/testing at any time w/o probable cause, have no direct or indirect contact w/ [redacted] and not enter any residence/place of employ[ment] place of education of any such person, not to be at [redacted]." App. at 32 – 33.

On November 6, 2018, Sloboda was indicted on a two count indictment in YRKCD-CR-18-826. App. at 38. The charges were one count of Burglary, class B, in violation of 17-A M.R.S. §401(1)(B)(4), and one count of Criminal Trespass, class D, in violation of 17-A M.R.S. § 402(1)(A). App. at 38.

On November 25, 2018, Sloboda's conditions of release were still active. Tr. at 53.[5]

B. November 25, 2018.

On or about November 25, 2018, Sloboda was investigated and charged with Interstate Kidnapping by the United States government in the District of Maine.[6] Tr. at 39 – 40, Detective Kyle Kassa (hereinafter "Detective Kassa") of the York County Sheriff's Department began investigating the facts and circumstances surrounding November 25, 2018 as part of the federal case. Tr. at 39 – 40, 41.[7] Sloboda was assigned defense counsel in his federal case. Tr. at 40. Sloboda's federal defense attorney met with federal investigators and indicated to federal authorities that video evidence may

[5] YRKCD-CR-18-826 was dismissed on May 22, 2019, because while probable cause was found, there was insufficient evidence to prove the case beyond a reasonable doubt at trial. App. at 34 – 35.

[6] The federal charges were ultimately dismissed. Tr. at 41.

[7] Detective Kassa was assigned to the FBI's Safe Streets Gang Task Force at the time of his investigation. Tr. at 38.

exist that was exculpatory to Sloboda in his federal case. Tr. at 40. Detective Kassa approached Robert Wentworth Jr. (hereinafter "Wentworth"), Loss Prevention Security Supervisor for Demoulas Supermarkets, Inc.[8] about reviewing security footage from November 25, 2018, of the Market Basket grocery store in Rochester, New Hampshire (hereinafter "Market Basket"). Tr. at 31 – 32, 40. Specifically, Detective Kassa requested the store surveillance video from November 25, 2018 between 10:30 AM to 12:30 PM. Tr. at 32. Wentworth provided Detective Kassa video that consisted of two angles, shot from each of the two entrance/exits of the Market Basket. Tr. at 32, 40.

As part of his investigation, Detective Kassa reviewed the Market Basket video and identified both Sloboda and [redacted] in the video. Tr. at 42-43. Detective Kassa identifies Sloboda and [redacted] entering Market Basket together through one doorway at 11:28 AM. Tr. at 42. Detective Kassa then identifies Sloboda and [redacted] departing together at 11:47. Tr. at 44.

At Trial, as part of the State's case-in-chief, the State introduced certified copies of both a November 6, 2018 indictment for Burglary alleging that Sloboda had committed Burglary against [redacted], Tr. at

[8] Demoulos Supermarkets Inc. is the parent company of the Market Basket supermarket chain. Tr. at 31.

69, a certified copy of bail conditions that were signed by Mr. Sloboda on September 4, 2018 and prohibited Mr. Sloboda from having contact with Ms. [redacted] or Ms. [redacted]. Tr. at 7. The State requested that the trial court take judicial notice of 17-A M.R.S. § 401(1)(B)4) and 17-A M.R.S. § 1252(2)(B), that Burglary is a crime punishable by more than a year in prison. Tr. at 9.

STATEMENT OF THE ISSUES

1. Whether the trial court had subject matter jurisdiction to convict the defendant of Violation of Conditions of Release for violating Maine conditions of release for conduct in New Hampshire.

2. Whether the evidence, viewed in a light most favorable to the State, was sufficient that a fact-finder could rationally find every element of the crime Violation of Conditions of Release.

SUMMARY OF THE ARGUMENTS

I. The trial court's conclusions of law are reviewed *de novo*. *State v. Cooper*, 2017 ME 4, ¶ 9. The trial court properly exercised subject matter jurisdiction over Count 4 of the superseding indictment. Tr. at 99. The State alleged that Sloboda had violated conditions of release pursuant to 15 M.R.S. § 1092(1)(B) and 15 M.R.S. § 1026(3)(A)(5) by having contact with [redacted] in New Hampshire while on conditions of release out of Maine. 17-A M.R.S. § 7(1)(A). The trial court properly found that

it had jurisdiction over Count 4 because the while contact did not occur in Maine, "the result of the contact," which was also an element of the crime, did occur in Maine. Tr. at 99. Because a person may be convicted under the laws of this State for any crime committed by the person's own conduct . . . only if . . . [e]ither the conduct that is an element of the crime or the result that is such an element occurs within this State or has a territorial relationship to this State, 17-A M.R.S. § 7(1)(A), the trial court did properly exercise subject matter jurisdiction over the charge. *cf State v. Collin*, 1997 ME 6.

II. When reviewing whether sufficient evidence exists in the record for the fact-finder to rationally find every element of the offense of Violation of Conditions of Release beyond a reasonable doubt, the evidence is viewed in the light most favorable to the State. *State v. Atkins*, 2015 ME 162, ¶ 20. In the instant matter Detective Kassa testified that he was provided surveillance video from Robert Wentworth, Loss Prevention Supervisor from the Market Basket in Rochester, New Hampshire. Tr. 31 – 32, 40. Detective Kassa viewed the surveillance video and observed individuals he knew to be [redacted] and Emanuel Sloboda walk in to the Market Basket together at 11:27 AM on November 25, 2018 and walk out at together at 11:48 AM. Tr. 42 – 44. Detective Kassa knew both

individuals from his investigations surrounding a federal case. Tr. at 42 – 43. [redacted] testified that [redacted] was [redacted]'s daughter and that [redacted] and Sloboda formerly were boyfriend/girlfriend. Tr. at 67. At the time that Sloboda and [redacted] walked into Market Basket together, Sloboda was on conditions of release out of York County Criminal Docket for felony Burglary. Tr. at 53. A condition of Sloboda's release that he was not to have contact with [redacted] or [redacted]. Tr. at 7. These facts were sufficient to establish, beyond a reasonable doubt, that Sloboda had contact with [redacted] when he was prohibited from doing so pursuant to existing conditions of release. *See Atkins* at ¶ 1.

ARGUMENT

I. THE TRIAL COURT PROPERLY EXERCISED SUBJECT MATTER JURISDICTION WHEN IT CONVICTED THE DEFENDANT OF VIOLATION OF CONDITON OF RELEASE BECAUSE THE ATTENDANT RESULT WAS OF THE DEFENDANT'S CONDUCT WAS A VIOLATION OF MAINE CONDITIONS OF RELEASE.

Sloboda was granted preconviction bail on pending felony Burglary charges out of the York County Criminal Docket. App. at 30. As a part of those bail conditions, Sloboda was specifically prohibited from having contact with [redacted]. App. at 30. On November 25, 2018, Mr.

Sloboda violated his conditions of release when he had contact with Ms. [redacted] at the Market Basket grocery store in Rochester, New Hampshire. Tr. at 109.

The trial court properly exercised subject matter jurisdiction over Sloboda when, after a bench trial, it convicted him of one count of Violation of Condition of Release for the November 25, 2018 conduct.

The Maine Criminal Code ("the Code") provides that "a person may be convicted under the laws of this State for any crime committed by the person's own conduct . . . only if . . . [e]ither the conduct that is an element of the crime or the result that is such an element occurs within this State or has a territorial relationship to this State[.]" 17-A M.R.S. § 7(1)(A). The Code defines the elements of a crime as consisting of "the forbidden conduct; the attendant circumstances specified in the definition of the crime; the intention, knowledge, recklessness or negligence as may be required; and ***any required result***." 17-A M.R.S. § 32 (emphasis added).

The elements of Violation of Condition of Release are: "(1) [t]he existence of a bail bond with conditions of release in effect at the relevant time, and (2) [c]onduct amounting to a violation of a condition." *State v. Leblanc-Simpson*, 2018 ME 109, ¶ 17; *See* 15 M.R.S. § 1092(1). In the case before this Court, Sloboda was subject to conditions of release, the conditions prohibited specific conduct, contact

with [redacted], and Sloboda violated those conditions by having contact with [redacted]. App. at 30, 33.

Applying 17-A M.R.S. § 7(1)(A) here, the trial court ruled as a matter of law, *see State v. Collin*, 1997 ME 6, ¶ 7 ("the existence of jurisdiction [is] a legal issue for the court rather than a factual question for the jury"), that:

> "The conduct in question is alleged contact. I think the State is able to prove the alleged contact here. That contact would have occurred, as alleged, in New Hampshire. And so the conduct that's an element of the offense did not occur in Maine. However, the result of that contact is an element as well. And that element has a territorial relationship to this state. The bail bond was issued in Maine by this court in connection with an underlying criminal charge in Maine. The defendant agreed to these conditions, executed the bail bond by signing it on September 4th, 2018, and that would have occurred in this court in Alfred, Maine. I find that to be a sufficient nexus or sufficient territorial relationship to this state and I think, therefore, there is jurisdiction under Section 7(a)(1)." Tr. at 99.

The trial court also distinguished this case from *Collins*, recognizing the important interplay between the crime charged and the application of 17-A M.R.S. §7(1)(A). Tr. at 100. The trial court said:

> "The Collin case . . . was entirely a different situation. In that case, the defendant was charged with receiving stolen property. The property was taken from Maine to Canada, given to the defendant in Canada, and the defendant sold it to another third party in Canada. The law court concluded there was no territorial jurisdiction in that case because all the elements of the offense occurred in Canada, not in Maine. So I find Collin to be distinguishable and not controlling these circumstances. So I conclude that the State has jurisdiction to prosecute this offense." Tr. at 100.

The Appellant argued at trial[9] (Tr. at 88 – 95), and again argues on appeal, that *Collin* is analogous and therefore controlling on whether the trial court had jurisdiction in the present case. Appellant Brief at 10. This argument misunderstands the interplay between the criminal statute being applied in *Collin* and § 7(1)(A).

At issue in *Collin* was whether the trial court had subject matter jurisdiction over the defendant for the crime of Receiving Stolen Property. *Collin*, at ¶ 11. In *Collin*, the defendant was convicted of a single count of "theft by obtaining or exercising control over property having a value over $5,000." *Id*. at ¶ 4. Pursuant to 17-A M.R.S. § 351, the State requested that the jury be instructed on two theories of, theft by unauthorized taking and theft by receiving stolen property. *Id*.; *See* 17-A M.R.S. § 351[10]. The defendant objected to the jury being instructed on the theft by receiving because all of the would-be elements of that crime occurred in Canada and the trial court lacked subject matter jurisdiction for that charge. *Id.* at ¶ 4. The trial court, over the defendant's objection, found as a matter of law, that jurisdiction existed pursuant to 17-A M.R.S. § 7(4)[11]. *Id. at ¶ 10,* (jurisdiction

[9] Sloboda does not specifically cite *Collin* in his closing argument, but does argue its analysis.

[10] 17-A M.R.S. § 351 provides that: An accusation of theft may be proved by evidence that it was committed in any manner that would be theft under this chapter, notwithstanding the specification of a different manner in the information or indictment." *Collin* at ¶ 4, footnote 1 (*quoting* 17-A M.R.S. § 351).

[11] 17-A M.R.S. § 7(4) provides that "Conduct or a result has a territorial relationship to this State if it is not possible to determine beyond a reasonable doubt that it occurred inside or outside of this State, because a boundary cannot be precisely located or the location of any person cannot be precisely established in relation to a boundary,

existed because the State "had a substantial interest in prohibiting [the defendant]'s conduct"). The trial court instructed the jury on both theories they could have found the defendant to have committed the theft. *Id.* at ¶ 4. The jury returned a guilty verdict without indicating which elements of theft they found beyond a reasonable doubt where the defendant had stolen property from a mill in Maine and then sold the stolen property in the Canadian Provence of New Brunswick. *Id.* at ¶¶ 2-3.

On appeal, this Court rejected the trial court's finding that jurisdiction existed pursuant to § 7(4), however, the State on appeal argued that the trial court still had jurisdiction, alternatively, pursuant to § 7(1)(A). *Id.* at ¶ 11. It is this Court's analysis that the trial court here and the State argue is relevant and distinguishable.

This Court rejected the State's argument that § 7(1)(A) would apply even if § 7(4) does not. *Id.* Central to this Court's analysis was identifying the elements of the crime of theft by receiving stolen property:

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and if the court determines that this State has a substantial interest in prohibiting the conduct or result. In determining whether this State has a substantial interest, the court shall consider the following factors:

A. The relationship to this State of the actor or actors and of persons affected by the conduct or result, whether as citizens, residents or visitors;

B. The location of the actor or actors and persons affected by the conduct or result prior to and after the conduct or result;

C. The place in which other crimes, if any, in the same criminal episode were committed; and

D. The place in which the intent to commit the crime was formed.

> "[A] person is guilty of theft, if he receives, retains or disposes of the property of another knowing that it has been stolen, or believe that it has probably been stolen, with the intention to deprive the owner thereof." 17-A M.R.S. § 359(1) (1983).

In rejecting the State's argument, this Court pointed out that § 359(1) does "not require a result. *Id.* The fact that the defendant's "conduct may have resulted in a loss to a Maine entity is irrelevant" for the purposes of jurisdiction. *Id.* Because the crime does not require a result and no elements of the crime occurred in Maine, "there is no basis for territorial jurisdiction over the" charge. *Id.*

Unlike the theft statute at issue in *Collin*, here, the Violation of Conditions of Release statute does have a result element. *See* 15 M.R.S. § 1092(1). To prove Violation of Condition of Release the State has to show there is "a bail bond with conditions of release in effect at the relevant time, and [c]onduct amounting to a violation of a condition." *State v. Leblanc-Simpson*, 2018 ME 109, ¶ 17. Because there is a "result" element in § 1092, this statute is distinguishable from theft statute that is analyzed in *Collin.*

The "result" element applied to the facts of this case, must take place in Maine. The conduct occurring out of state, contact, violates the Maine conditions of release as conditions of release are ordered, issued and signed in Maine. App. at 30; *See generally* 15 M.R.S. §§ 1003 – 1099 (Maine Bail Code). Therefore, *Collin* is distinguishable under § 7(1)(A) the trial court did have subject matter

jurisdiction over the Violation of Conditions of Release charge, count 4, the Court did not improperly exercise subject matter jurisdiction.[12]

III. THE STATE INTRODUCED SUFFICIENT EVIDENCE THAT A FACT-FINDER COULD RATIONALLY FIND EVERY ELEMENT OF THE CRIME OF VIOALTION OF CONDITIONS OF RELEASE BEYOND A REASONABLE DOUBT.

As this Court recognized in *State v. Atkins*, 2015 ME 162, "when determining whether the record contained enough evidence to support a criminal defendant's conviction, we view 'the evidence in the light most favorable to the State to determine whether the fact-finder could rationally find every element of the offense beyond a reasonable doubt.'" *Id*. at ¶ 20 (*quoting State v. Sanchez*, 2014 ME 50, ¶ 8). The Law Court "will overturn a verdict for insufficient evidence 'only when no trier of fact rationally could have found the essential elements of the charged offense beyond a reasonable doubt.'" *State v. McCurdy*, 2002 ME 66, ¶ 10, (quoting *State v. Tai*, 629 A.2d 594, 494 (Me. 1993)). When reviewing a sufficiency of the evidence challenge this Court views "the evidence, and all reasonable inferences that may be drawn from that evidence in the light most favorable to the trial court's judgment to determine whether the fact-finder

[12] Sloboda further argues that being on conditions of release does not expand the State's jurisdiction over him, but simply "establishes a status of Sloboda." Appellant's Brief at 11. This argument misunderstands the role of preconviction bail. Bail conditions by their very nature expand the jurisdiction of a sovereign over a defendant. See Generally 15 M.R.S. § 1003(1)(A). By signing bail conditions and agreeing to the conditions of release, a defendant is agreeing to more expansive jurisdiction by the sovereign in exchange for a pretrial release.

rationally could have found each element of the charged offense proved beyond a reasonable doubt." *Leblanc-Simpson* at ¶ 15.

As recited above, the elements of the crime of Violation of Condition of Release are: "[t]he existence of a bail bond with conditions of release in effect at the relevant time, and (2) [c]onduct amounting to a violation of a condition." *Leblanc-Simpson* at ¶ 17. Violation of Conditions of Release becomes a felony if the underlying crime which the defendant was conditionally released on "was punishable by a maximum period of imprisonment of one year or more" and the condition violated was to "[a]void all contact with a victim of the alleged crime . . . or with any other family or household members of the victim." 15 M.R.S. § 1092(1)(B) (2005); 15 M.R.S. § 1026(3)(A)(5) (2007). "Violation of Condition of Release is a strict liability crime" and the State had no obligation to prove Sloboda's state of mind. *Leblanc-Simpson* at ¶ 18; *See* 17-A M.R.S. § 1092(3).

Here, the trial court summarized its findings as:

> "What clinches it for me is that we have two images and those images are at 11:28 approximately and 11:47, approximately 20 minutes apart. And those two individuals are still together. They walk in together. They walk out together. I think that's a strong basis to conclude circumstantially that there was contact between [Sloboda] and [redacted]." Tr. at 106.

The trial court stressed the evidentry importance that both parties entered and exited the store together:

> "[I]f the State had offered only one of these two, Exhibit 6 or Exhibit 7, it would be a much closer call because circumstantially - - especially in Exhibit 6 – it possible that those two individuals could have walked in randomly at the same time." Tr. at 106.

However, the trial court found the evidence to show that Sloboda and [redacted] were together and even if they were not speaking, they were having contact. This Court's decisions in *Elliott* and *Gantnier* support the trial court's findings. *See Gantnier* at ¶ 22, ("when contact with a [person] is prohibited by a bail bond or as a condition of release, proof of intentional but indirect contact with the [person] can be sufficient to establish a violation.").

Sloboda argues that photographs and video "which purport to show to people walk many feet apart, with absolutely no other corroborating testimony . . . falls far short of" proving Sloboda had contact with [redacted] beyond a reasonable doubt. Appellant Brief at 15.

An order that prohibits direct or indirect contact "instructs a defendant not to meet, connect, or communicate with the protected person." *State v. Elliot*, 2010 ME 3, ¶ 34. When a defendant, subject to an order, proceeds or comes after an individual with whom contact is prohibited, that conduct "inherently involves a direct or indirect meeting with that person in a defined geographic area and at particular times." *Id.* at ¶ 35. *See Also State v. Gantnier*, 2012 ME 123, ¶ 22

("proof of intentional but indirect contact is sufficient to establish a violation" of conditions of release prohibiting contact).

By Sloboda's own concession, Sloboda and [redacted] walk in to Market Basket at the same time, feet away from one another at the same location and leave in the same manner (Appellant Brief at 15); this is factually sufficient under *Elliott* and *Gantnier* for the trial court to find Sloboda guilty beyond a reasonable doubt.

Sloboda also raised the affirmative defense of "just cause." Tr. at 93. The trial court rejected that defense in finding Sloboda guilty. Tr. at 82, 109, App. at 23. The trial court noted that "just cause" is an affirmative defense. Tr. at 106. The trial court went to find that Sloboda had not produced any evidence to support the affirmative defense of "just cause." Tr. at 107. A defendant "raising just cause as an affirmative defense under 15 M.R.S.A. § 1092(2), therefore, must prove, by a preponderance of the evidence, that it was reasonable for him to believe that he had a justifiable reason for violating a condition of his release or that the violation occurred through no fault of the defendant." *State v. Small*, 2000 ME 182, ¶ 4. *See Also* 15 M.R.S. § 1092(2).

Here, there was no evidence introduced at trial that suggests that it was reasonable for Sloboda to believe that he was justified in violating his conditions of release. Tr. at 82. Because Sloboda could not carry his burden of a preponderance

of the evidence, the "just cause" affirmative defense was not available to him. *See* 17-A M.R.S. § 101(2) (1983).

For all of the reasons stated above, the evidence when viewed in a light most favorable to the trial court's ruling, there was sufficient evidence for Sloboda to be convicted of Count 4 with proof beyond a reasonable doubt.

CONCLUSION

This Court should deny the Appellant's claims on appeal and affirm the conviction against him for the reasons previously discussed herein as a matter of law.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I, Andrew E. Berggren, Esq., do hereby certify that I have mailed two copies of the attached Brief for the State of Maine to:

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